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12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
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Civil Action No. 4:11-cv-05341 (YGR)

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
FREESCALE SEMICONDUCTOR'S
STIPULATED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP, counsel for
3 Defendant Freescale Semiconductor, Inc. (Freescale). I submit this declaration in support of
4 Freescale's Stipulated Administrative Motion to File Under Seal (Motion). I have personal
5 knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and
6 would do so competently.

7 2. Portions of Freescale's Motion to Exclude Certain Testimony of Catherine M.
8 Lawton, Exhibit 1, Exhibit 3, and Exhibit 6 to the Declaration of Michelle Yang (Yang
9 Declaration) include information that MediaTek Inc. (MediaTek) has designated "Highly
10 Confidential – Attorneys' Eyes Only" Pursuant to the Stipulated Protective Order in this action.
11 Dkt. No. 100. MediaTek is the designating party of this information that Freescale seeks to file
12 under seal in its Motion.

13 3. Portions of Exhibit 1 and Exhibit 2 to the Yang Declaration containing
14 confidential sales and marketing information, includes information designated "Highly
15 Confidential – Attorneys' Eyes Only" by Non-Party Ford Motor Company Inc.

16 4. To comply with the Stipulated Protective Order in this litigation, Freescale
17 redacted those portions of Freescale's Motion to Exclude Certain Testimony of Catherine M.
18 Lawton and exhibits 2 and 6 to the Yang Declaration. These redactions are narrowly tailored to
19 protect only information designated as confidential by MediaTek and Ford.

20 5. On November 5, 2013, counsel for MediaTek stipulated to Freescale's Motion to
21 file under seal those portions of portions of Freescale's Motion to Exclude Certain Testimony of
22 Catherine M. Lawton and supporting exhibits that contain information designated as "Highly
23 Confidential – Attorneys' Eyes Only."

24 I declare under penalty of perjury under the laws of the United States of America that the
25 foregoing is true and correct. Executed this 5th day of November, at Washington, D.C.

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27 /s/ Michelle Yang
Michelle Yang

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Dated: November 5, 2013